

**JAMES KOUSOUROS**  
ATTORNEY AT LAW

260 Madison Avenue, 22nd floor • New York, NY 10016  
212•532•1934 / 212•532•1939 fax  
E-mail: James@kousouroslaw.com

JAMES KOUSOUROS  
FOUNDER & PRINCIPAL

STUART GOLD  
SENIOR COUNSEL

EMMA J. COLE  
LEGAL ASSISTANT

December 29, 2022

By ECF

Hon. Victor Marrero  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 12/30/2022

**Re: *United States v. Narek Marutyan, et al.*, 20 Cr. 652 (VM)**

Dear Judge Marrero:

This letter is respectfully submitted to request the Court issue an order temporarily modifying the conditions of Mr. Marutyan's bond to permit him to travel to Manhattan, New York on January 1, 2023, and January 2, 2023, from 4:00 p.m. to 11:00 p.m. so that he may take his wife and children to visit Christmas sights in Manhattan including the Rockefeller Christmas tree.

Pretrial Services Officer Francesca Piperato objects to the instant request per Pretrial Services policy as Mr. Marutyan is subject to home detention. However, she notes that since Mr. Marutyan returned to New York and has been under her supervision he has been compliant. The Government object to the request, consistent with the policy of Pretrial Services regarding home detention.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros

James Kousouros, Esq.

c.c.

Emily Deininger  
Assistant United States Attorney

Francesca Piperato  
Pretrial Services Officer

**Request GRANTED.** Defendant's bail conditions are modified to authorize leave of home and travel to Manhattan on a date and time approved by Probation for the purpose and on the terms specified in the request.

**SO ORDERED.**

12/30/2022

DATE

  
VICTOR MARRERO, U.S.D.J.